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U.S. DISTRICT COURT  
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DISTRICT OF UTAH  
BY: \_\_\_\_\_  
DEPUTY CLERK

IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF UTAH, CENTRAL DIVISION

SECURITIES AND EXCHANGE  
COMMISSION,

PLAINTIFF,

v.

JERSEY CONSULTING LLC, a Nevada  
limited liability company, MARC ANDREW  
TAGER, an individual, SUZANNE AILEEN  
GAGNIER, an individual, KENNETH  
STEPHEN GROSS, an individual, JEFFREY  
ROWLAND LEBARTON, an individual,  
JONATHAN EDWARD SHOUCAIR, an  
individual, and JASON VITOLO, an individual,

DEFENDANTS; and

PREMIER MARKETING SOLUTIONS, INC.,  
a California corporation, EQUITY FIRST  
PROPERTIES INC., a California corporation,  
MATTHEW JACOB FREITAS, an individual,  
ROXANE MARIE GROSS, an individual,  
MATTHEW EARL MANGUM, an individual,  
and CHRISTINE L. SHOUCAIR, an individual,

RELIEF DEFENDANTS.

**STIPULATION TO ENTRY OF  
PRELIMINARY INJUNCTION  
AGAINST DEFENDANT  
SUZANNE AILEEN GAGNIER**

Case No.: 2:18-cv-00155


Judge: Bruce S. Jenkins

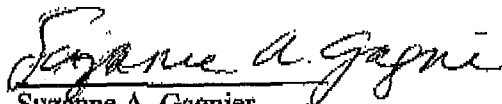
This Stipulation is entered into by and among the Securities and Exchange Commission (the "Commission"), and Defendant Suzanne Aileen Gagnier. The Commission and Defendant Gagnier (collectively the "Parties") hereby stipulate as follows:

**IT IS STIPULATED** that pending final adjudication of this matter, or such other time as the Court may order: Defendant and each of his officers, agents, servants, employees and attorneys and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, including facsimile transmission, electronic mail, or overnight delivery service, are hereby prohibited from soliciting, accepting, or depositing any monies obtained from actual or prospective investors whether directly or indirectly, including, but not limited to, through any entity owned or controlled by each.

**IT IS STIPULATED** by the Parties that the attached Preliminary Injunction Order should be entered by the Court.

Dated this 27th day of February, 2018.

  
Amy J. Oliver  
Daniel J. Wadley  
Securities and Exchange Commission  
Attorneys for Plaintiff

  
Suzanne A. Gagnier  
Defendant

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ROWLAND LEBARTON, an individual,  
JONATHAN EDWARD SHOUCAIR, an  
individual, and JASON VITOLO, an individual,

DEFENDANTS; and

PREMIER MARKETING SOLUTIONS, INC.,  
a California corporation, EQUITY FIRST  
PROPERTIES INC., a California corporation,  
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ROXANE MARIE GROSS, an individual,  
MATTHEW EARL MANGUM, an individual,  
and CHRISTINE L. SHOUCAIR, an individual,

RELIEF DEFENDANTS.

**PRELIMINARY INJUNCTION  
ORDER**

Case No.: 2:18-cv-00155

Judge: Bruce S. Jenkins

On February 20, 2018, Plaintiff Securities and Exchange Commission filed a Complaint against Defendants Jersey Consulting, LLC and Marc Andrew Tager alleging violations of Sections 5(a), 5(c), and 17(a)(1), (2), and (3) of the Securities Act and Section 10(b) of the Exchange Act and Rule 10b-5 thereunder; against Defendants Suzanne Aileen Gagnier, Jeffrey Rowland Lebarton, Jonathan Edward Shoucair, and Jason Vitolo alleging violations of Sections 5(a) and 5(c) of the Securities Act and Section 15(a) of the Exchange Act; and against Defendant Kenneth Stephen Gross alleging violations of Sections 5(a) and 5(c) of the Securities Act and Sections 15(a) and 15(b) of the Exchange Act. As set forth in the Stipulation of each of the above-named Defendants, each Defendant stipulates to the entry of this Preliminary Injunction Order ("Order"). The court is fully advised in these premises and orders as follows:

**IT IS HEREBY ORDERED** that pending final adjudication of this matter or at such other time as the Court may order: Defendants Jersey Consulting, LLC, Marc Andrew Tager, Suzanne Aileen Gagnier, Kenneth Stephen Gross, Jeffrey Rowland Lebarton, Jonathan Edward Shoucair, and Jason Vitolo and each of their officers, agents, servants, employees and attorneys and those persons in active concert or participation with them who receive actual notice of this Order by personal service or otherwise, including facsimile transmission, electronic mail, or overnight delivery service, are hereby prohibited from soliciting, accepting, or depositing any monies obtained from actual or prospective investors whether directly or indirectly, including, but not limited to, through any entity owned or controlled by each.

IT IS SO ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2018 at \_\_\_\_\_ a.m./p.m.

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Bruce S. Jenkins  
Senior United States District Judge